

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

BK NO.: 18-10820
Chapter 7

In Re:)

Kristin M. Allard,)
Debtor)

Shamrock Finance LLC,)
Plaintiff)

v.)

Kristin M. Allard,)
Defendant)
_____)

**RULE 26(f) CERTIFICATION AND
WRITTEN REPORT OUTLINING
PROPOSED DISCOVERY PLAN**

Adversary Proceeding

No. 19-01007

Pursuant to Fed. R. Civ. P. Rule 26(f), as made applicable herein by Rule 7026 of the Federal Rules of Bankruptcy Procedure, Plaintiff Shamrock Finance LLC (“Plaintiff”) and Defendant Kristin M. Allard (“Defendant”) hereby file this certification and written report outlining a proposed discovery plan.

A. CERTIFICATION

The undersigned hereby certify that from and after they conferred by telephone and electronic mail pursuant to Fed. R. Civ. P. Rule 26(f), as made applicable by Rule 7026 of the Federal Rules of Bankruptcy Procedure, to consider the nature and basis of their claims, defenses and the possibility for the prompt settlement or resolution of the above-captioned adversary proceeding, and to develop a proposed discovery plan.

B. PROPOSED DISCOVERY PLAN

The parties propose the following discovery plan:

- a. All discovery shall be completed on or before July 22, 2019, unless the Court upon appropriate motion alters the time and manner of discovery;

- b. The parties shall complete and file a Joint Pretrial Memorandum on or before September 23, 2019.

The parties currently do not believe that any changes are necessary to the manner of and limitations on discovery provided by the rules of this Court.

C. AUTOMATIC DISCLOSURES

The parties state that they will comply with the automatic disclosure provision of Rule 26(a)(1) and (2) on or before June 4, 2019 as required by Rule 26(a)(1)(C).

D. ESTIMATED LENGTH OF TRIAL

The parties estimate that trial will take no more than one (1) day.

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Respectfully submitted,
SHAMROCK FINANCE LLC
By its attorneys,

/s/ James J. McNulty*
James J. McNulty, Esq.
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Dated: May 21, 2019

Respectfully submitted,
KRISTIN M. ALLARD
By her attorney,

/s/ Peter G. Berman
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Dated: May 21, 2019

* Signed with permission pursuant to MLBR Appendix 8, Rule 8.